

Office of Pesticide Programs, Special Review and Reregistration Division
SMART Meeting Minutes, MGK 326 Reregistration Eligibility Decision (RED)

Chemical Case # 2215

October 16, 2002, Crystal Mall 2, Room 650, 2:00 - 3:30

Attendees:

Tawanda Spears, Chemical Review Manager, SRRD
Barry O'keefe, Acting Team Leader, SRRD
Michael Goodis, Acting Branch Chief, SRRD
Ann Sibold, RD
Joseph Tavano, RD
Rebecca Daiss, Risk Assessor, HED
Abdallah Khasawinah, Toxicologist, HED
Jerry Stokes, Residue Chemist, HED
David Jaquith, ORE Risk Assessor, HED
Stephen Smearman, Economist, BEAD
Henry Craven, Environmental Chemist, EFED
Jim Goodyear, EFED
Bill Chase, MGK

The SMART Meeting began with a welcome and description of the purpose of the meeting. Next the members from the Reregistration Eligibility Decision (RED) team including HED, EFED, BEAD, RD and SRRD as well as the technical registrant, McLaughlin Gormley King Company (MGK), proceeded with introductions.

Following introductions, the Chemical Review Manager for MGK 326 gave a brief chronicle of the RED development process and goals. Thereafter, the meeting was turned over to the MGK representative to give the Agency some history about the company.

According to Mr. Chase, MGK gross sales are less than \$50 million world wide for all compounds and products sold, including MGK 326. In addition, total pounds of MGK 326 active ingredient have been declining since 1999, however, due to the outbreak of West Nile and increased horse mortality it is assumed that usage may have expanded in 2002.

Furthermore, Mr. Chase proceeded with going through the list of questions the Agency sent to MGK prior to the SMART meeting. A lot of the generic SMART meeting preparatory questions did not relate to MGK 326 because of its unique use pattern. Nevertheless, Mr. Chase explained to the Agency that MGK 326 is used solely as an insect repellent on humans and companion animals. In addition, Mr. Chase and the Agency agreed that the DEET survey should provide some of the best available information concerning the MGK 326 use pattern. The reason being, DEET and MGK 326 are typically used together in formulating human repellents,

therefore it is the assumption that the two chemicals would have similar use patterns. Additionally, there was a consensus that MGK 326 is never used as the sole active ingredient in a product formulations.

Another avenue identified for obtaining use information was through the Residential Exposure Joint Venture (REJV) survey. REJV surveys offer data on the daily usage of a household which would increase the a level of confidence should it match the DEET survey. Jeff Dawson was mentioned as the Agency contact person for gathering REJV data.

Mr. Chase reiterated and reconfirmed that MGK does not and will not be supporting any food uses for MGK 326. Unfortunately, several active end use product labels still have food uses on the labels. All affected labels have been identified be SRRD and RD. RD staff acknowledged that the process for removing all food uses from current MGK 326 labels is still ongoing. Further, once all the labels have been modified the tolerances for meat and milk will be revoked.

Lastly, there was mention that MGK 264 is not a real synergist to MGK 326. Also, there are no broadcast sprays nor occupational exposure concerns.

A list of action items was also discussed and includes the following:

- Registrant will provide the Agency with a percentage breakdown for end-use products based on lbs. a.i., regarding the amount of MGK 326 used on animals versus humans (i.e. supposedly 85% animal vs. 15% human).
- Carcinogen Reclassification may be under consideration pending registrant's decision to submit a rebuttal.
- Registrant will provide the Agency with data on the metabolites of MGK 326 within a month from the date of the SMART meeting.
- HED and BEAD will review the DEET Survey for viability in the HED risk assessment.